



**Eric Gonzalez**  
District Attorney

**DISTRICT ATTORNEY  
KINGS COUNTY**

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**[INSERT NAME]**  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME:           MICHAEL DEFILIPPO**

**MOS TAX:           [REDACTED]**

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

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**Disclosure # 1:**

MOS DEFILIPPO IS A NAMED DEFENDANT IN THE FOLLOWING CIVIL ACTION(S):  
TONY WHITE V. CITY OF NEW YORK, ET AL, 15-CV-04290, FILED IN THE EASTERN DISTRICT OF NEW YORK

**BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:**

**Disclosure # 2:**

CCRB No. 201908809

Report Date: 10/08/2019

Incident Date: 09/26/2019

CCRB SUBSTANTIATED ALLEGATIONS:

1. Abuse - Entry of Premises
2. Abuse – Frisk
3. Abuse - Threat of force (verbal or physical)

OTHER MISCONDUCT NOTED:

1. OMN - Failure to produce stop and frisk report

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